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12 Attorneys for Defendant
CIGNA GROUP INSURANCE, INC., a corporation. (sued
13 herein as: aka CONNECTICUT GENERAL LIFE. aka LIFE
INSURANCE COMPANY OF NORTH AMERICA), and
14 DOES 1-10, inclusive

15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA - RENO**

17
18 JAMES TURNER,) Case No. 3:18-cv-00314-MMD-WGC
19 Plaintiff,)
20 vs.) **STIPULATION AND
CIGNA GROUP INSURANCE, INC., a) ORDER FOR ADDITIONAL
corporation; aka CONNECTICUT GENERAL) EXTENSION OF TIME FOR
LIFE. aka LIFE INSURANCE COMPANY OF) DEFENDANT TO ANSWER OR
NORTH AMERICA, and DOES 1-10, inclusive,) OTHERWISE RESPOND TO THE
21) COMPLAINT (THIRD REQUEST)
22)
23) Judge: Miranda M. Du
24)
Defendant.) Complaint Filed (State): May 30, 2018**

25 IT IS HEREBY STIPULATED by and between the parties hereto through their respective
26 attorneys that Defendant LIFE INSURANCE COMPANY OF NORTH AMERICA (also improperly
27 named herein as Cigna Group Insurance, Inc. and Connecticut General Life) may have an additional
28 week in which to answer or otherwise respond to plaintiff's complaint.

This is the parties' third requested extension. The first extension was three weeks. The second request was one week. This third request is for an additional week which would require Defendant to respond on or before August 10, 2018.

Good cause exists for this request. The parties have agreed that Plaintiff will amend the complaint to reflect a claim for relief under ERISA and remedies that are consistent with ERISA. The parties anticipate that Plaintiff will file the amended complaint within the next 7 (seven) days. By granting this additional extension, the Court will avoid the need for the parties and the Court to expend resources on a motion to dismiss for failure to state a claim on which relief can be granted.

This extension will not affect any existing deadline already scheduled by the Court.

This document is being electronically filed through the Court's ECF System. In this regard, counsel for Defendant hereby attests that (1) the content of this document is acceptable to all persons required to sign the document, (2) Plaintiff has concurred with the filing of this document; and (3) a record supporting this concurrence is available for inspection or production if so ordered.

Dated: August 3, 2018

Kevin Russell Karp

By: /s/ Kevin Russell Karp
Kevin Russell Karp (NV Bar No. 1082)
557 Washington Street
Reno, NV 89503
Telephone: (775) 827-2557

Dated: August 3, 2018

MESERVE, MUMPER & HUGHES LLP
Anna Maria Martin

By: /s/ Anna Maria Martin
Anna Maria Martin (NV Bar No. 7079)
MESERVE, MUMPER & HUGHES LLP
316 California Ave. #216
Reno, Nevada 89509

IT IS SO ORDERED:

Walter G. Cobb

UNITED STATES MAGISTRATE JUDGE

DATED: August 6, 2018.